

Chief, Standardization Branch,
Livestock and Seed Program,
AMS, USDA, Room 2603-S, Stop 0254, 1400
Independence Avenue, SW,
Washington, DC 20250-0254.

Docket Number **LS-02-02** concerning Meat Marketing Claims

Please withdraw proposed meat marketing claims and standards and start over again. Please consult closely with family farm, consumer, humane, and environmental organizations before issuing a final proposal.

I care deeply about being able to purchase grass-fed, free-range, and antibiotic free meat and want proposed USDA claims to meet my expectations.

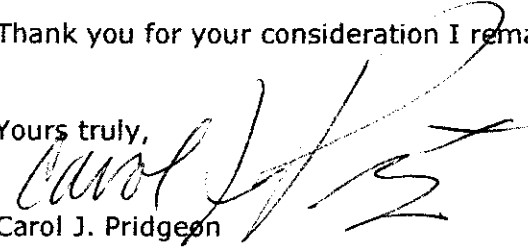
I am concerned that USDA does not define the term "sub therapeutic" and that other institutions have varied and conflicting definitions. I understand they propose a labeling claim for "no detectable antibiotic residue", which could mislead consumers to believe that they are purchasing meat from producers whose practices do not contribute to antibiotic resistance, even though producers using the claims are using antibiotics.

The label claim for "Grass-Fed" appears to create a loophole for producers who want to market their livestock as grass-fed when in fact the animal is receiving grain supplements for a large percentage of their production cycle. Furthermore, the grass-fed claim could confuse consumers who buy grass-fed meat for specific, nutritional benefits only achieved when livestock are strictly grass-fed in the final months before slaughter.

The claim for "Free-Range, Free-Roaming and Pasture-Raised" meat has definitional problems as well. The Notice defines these label claims as "Livestock that have had continuous and unconfined access to pasture throughout their lifecycle, including: Cattle and Sheep- which shall never be confined to a feedlot; and Swine which shall have continuous "access" to pasture for at least 80% of their production cycle. The proposed labeling claims do not provide a definition for "feedlot" as it relates to Cattle and Sheep and they do not define "access" in the case of swine. Furthermore, it is unclear whether the whole-herd, including the breeder stock for the livestock being produced, are raised continuously under these minimum standards.

Thank you for your consideration I remain;

Yours truly,


Carol J. Pridgen